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19
20 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA

21 CHASOM BROWN, WILLIAM BYATT,
22 JEREMY DAVIS, CHRISTOPHER
23 CASTILLO, and MONIQUE TRUJILLO
24 individually and on behalf of all similarly
situuated,

25 Plaintiffs,

26 vs.

27 GOOGLE LLC,

28 Defendant.

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Case No.: 5:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
PORTIONS OF 30(b)(6) DEPOSITION
JOINT LETTER BRIEF SHOULD BE
SEALED**

Referral: The Honorable Susan van Keulen

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether
 2 Google LLC's ("Google") material should be sealed. The material is included within the parties'
 3 joint letter brief regarding Plaintiffs' 30(b)(6) deposition notices.

| 4 Document Sought to 5 be Sealed | 6 Party Claiming 7 Confidentiality | 8 Portions to be filed 9 under seal | 10 Basis for Sealing 11 Portion of Document |
|---|---------------------------------------|---|--|
| 12 30(b)(6) Joint Letter 13 Brief | 14 Google | 15 Portions highlighted in 16 yellow on Pages 1, 2, 17 3, 4, 5 | 18 Refers to material 19 designated 20 "Confidential" and 21 "Highly Confidential" 22 pursuant to the 23 Protective Order |
| 24 Exhibit A to 30(b)(6) 25 Joint Letter Brief | 26 Google | 27 Portions highlighted in 28 yellow on pages 1, 2, 1, 3, 6, 7, 8, 15, 16, 17, 21, 22, 23, 24, 25, 26, 27, 31, 32 | 29 Refers to material 30 designated 31 "Confidential" and 32 "Highly Confidential" 33 pursuant to the 34 Protective Order |

13 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
 14 responsibility to establish that its designated material is sealable.

16 Dated: February 17, 2022

17 Respectfully submitted,

18 By: /s/Amanda Bonn

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